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Wesley Monroe

Applicant : Eron A. Jokipii Confirmation No. 2085
Application No. : 09/717,822
Filed : November 20, 2000
Title : MULTI-LANGUAGE SYSTEM FOR ONLINE COMMUNICATIONS

Grp./Div. : 2626
Examiner : Brian Albertalli

Docket No. : 40914/Y62

**SUBMISSION OF APPELLANT'S BRIEF
TO THE BOARD OF PATENT APPEALS AND INTERFERENCES**

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Post Office Box 7068
Pasadena, CA 91109-7068
February 26, 2007

Commissioner:

Enclosed for filing is the Appellant's Brief for this application.

An extension of time to file Appellant's Brief is requested, and a Petition for Extension of Time and the applicable fee are enclosed.

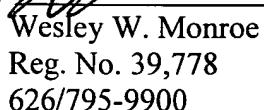
No fee is required for this Notice of Appeal because the fee was paid in a prior appeal.

The Commissioner is hereby authorized to charge any further fees under 37 CFR 1.16 and 1.17 which may be required by this paper to Deposit Account No. 03-1728. Please show our docket number with any charge or credit to our Deposit Account. **A copy of this letter is enclosed.**

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By



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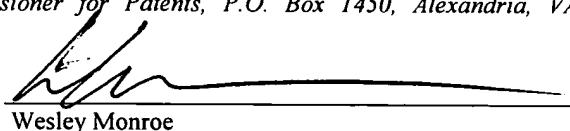
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Applicant : Eron A. Jokipii Confirmation No. 2085
Application No. : 09/717,822
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Grp./Div. : 2654
Examiner : Patrick Nestor Edouard
Docket No. : 40914/Y62

APPEAL BRIEF

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Commissioner:

1. REAL PARTY IN INTEREST

Yahoo! Inc. is the real party in interest.

2. RELATED APPEALS AND INTERFERENCES

None

3. STATUS OF CLAIMS

Claims 1-33 are rejected. Claims 1-33 are appealed.

4. STATUS OF AMENDMENTS

No amendments have been filed subsequent to final rejection.

5. SUMMARY OF CLAIMED SUBJECT MATTER

In general, the application is directed to a system and method for allowing improved communication between computer users communicating with each other using different languages. The invention, as defined by the claims, can be used in such a system and method.

Independent claims 1, 19, 26, 28, 29, 30, 31, 32 and 33 are involved in the appeal. A concise explanation of the subject matter defined in each of these claims follows. This concise explanation of the subject matter defined in each of the independent claims is for the convenience of the Board, as required by 37 C.F.R. § 41.37(c)(v), and is not intended and should not be used to interpret the language of the claims or broaden or narrow the scope of such claims. References to the specification and drawings are also provided as examples and for convenience, as required by 37 C.F.R. § 41.37(c)(v), and are not intended and should not be interpreted to necessarily be a complete recitation of all instances in the specification and drawings relevant to the claim element(s) corresponding to such reference. Similarly, references to the specification or drawings do not imply that the portions referenced necessarily fall within or without of the scope of the claim element(s) corresponding to such reference. References to the specification are in the form of [page]:[line]-[line] or [page]:[line]-[page]:[line]. References to the drawings are in the form of FIG. [num]: [reference numeral], [reference numeral].

While independent claims 19, 26, and 28-33 are similar to claim 1 in some ways, for convenience, some of the differences between these claims and claim are noted by italics in their summaries.

Claim 1 – A system includes a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG.1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer has a conversion table that includes unique key value (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-31, 7:6-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211. The computer is programmed to receive a selection of a word or

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phrase, convert it into a unique key using the conversion table and transmit the unique key value to the network server. 13:10-26, 17:15-29, FIG. 6: 611.

Claim 19 – A system includes a communications network , 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG.1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The server has a *server* conversion table that includes unique key value (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:32-8:29, 11:9-32, 15:21-16:11, FIG. 3: 311. The *server* is programmed to receive a word or phrase *from one of the computers* and convert the word using the *server* conversion table. 14:5-14:18, 17:30-18:10.

Claim 26 – A *conversion table* that includes unique key values (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-31, 7:6-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211. The conversion table is for use in a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG.1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201, where one of the computers is programmed to receive a selection of a word or phrase, convert it into a unique key using the conversion table and *convert the unique key value into a phrase using a language key and the conversion table*. 11:9-32, 13:10-26, 15:21-16:11, 17:15-29, FIG. 6: 611.

Claim 28 – A *method* for use in a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects network servers, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG.1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer and the network servers have conversion tables 211, 311 that include unique key values (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-8:29, 11:9-32, 12:15-35,

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13:27-14:4, 15:21-16:11, FIG. 2: 211, FIG. 3: 311. A first computer receives a selection of a word or phrase, converting it into a unique key using its conversion table and transmitting the unique key value to the network server. *The network server transmits the unique key value to a second computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201, which receives it, looks up a phrase or word in its conversion table for the unique key value and a language key and displays that phrase or word. 13:10-14:4 17:15-29, FIG. 6: 601, 603, 607, 609.*

Claim 29 – A *method* for use in a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG. 1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer and the network server have conversion tables that include unique key values (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211, FIG. 3: 311. *The network server receives a selection of a word or phrase, looks up a unique key value for it and transmits the unique key value to the computer. 14:5-14:18, 17:30-18:10. The computer receives the unique key value from the network server, looks up a word or phrase for the unique key value and a language key up in its conversion table and displays that word or phrase. 11:9-32, 13:27-14:4, 15:21-16:11, 17:15-29, FIG. 6: 601, 603, 607, 609.*

Claim 30 – A *method* for use in a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer has a conversion table that includes unique key values (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-31, 7:6-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211. A computer receives a selection of a word or phrase, looks up a unique key for it using the conversion table and transmits the unique key value to a second computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, 18:27-32, FIG. 1:

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119, 127, FIG. 2: 201, FIG. 6: 611. *The second computer receives it, looks up a phrase or word in its conversion table for the unique key value and a language key and displays that phrase or word.* 18:27-32.

Claim 31 – A *method* for use in a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG. 1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer and the network server have conversion tables that include unique key values (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211, FIG. 3: 311. A first computer receives a selection of a word or phrase, converting it into a unique key using its conversion table and transmitting the unique key value to the network server. *The network server looks up a phrase or word in its conversion table for the unique key value and a language key and transmits that phrase or word to a second computer that receives and displays that phrase or word.* 13:27-14:18, 17:15-18:10, FIG. 6: 601, 603, 607, 609.

Claim 32 – A system includes a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG. 1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14, 13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer has a conversion table that includes unique key value (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-31, 7:6-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211. The computer is programmed to receive a selection of a *unique key value*, convert it into a *word or phrase* using the conversion table and *display the word or phrase.* 13:27-14:4 17:15-29, FIG. 6: 601, 603, 607, 609.

Claim 33 – A system includes a communications network, 4:5-18, 8:30-9:5, FIG.1: 111, 113, 115, 125, that connects at least one network server, 4:5-6:4, 6:5-24, 8:30-10:5, 10:15-24, 14:28-15:5, FIG. 1: 103, FIG. 3: 301, to at least one computer, 4:5-33, 5:31-6:4, 11:33-12:14,

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13:10-13:26, 16:12-24, 17:15-29, FIG. 1: 119, 127, FIG. 2: 201. The computer has a conversion table that includes unique key value (Table A, “key value”) for a number of words or phrases, a language key (Table A, “int. code”) and text phrases (Table A, “string”) for unique key values and language keys in the conversion table. 6:25-31, 7:6-8:29, 11:9-32, 12:15-35, 13:27-14:4, 15:21-16:11, FIG. 2: 211. The computer is programmed to receive a selection of a word or phrase, convert it into a *converted word or phrase* using the conversion table and transmit the *converted word or phrase* to the network server. 13:10-26, 17:15-29, 18:27-32, FIG. 6: 611.

6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-33 stand rejected under 35 U.S.C. 103(a) as being obvious over U.S. Patent No. 6,493,661 to White, III et al. in view of U.S. Patent No. 6,490,547 to Atkin et al.

7. ARGUMENT

The examiner rejects claims 1, 19, 26 and 28-33 as unpatentable under 35 U.S.C. 103(a) as being obvious over White, III et al. (6,493,661) (“White”) in view of Atkin et al. (6,490,547) (“Atkin”).

a. Claims 1-3

With respect to independent claim 1, the examiner asserts that White discloses all of the elements of claim 1 except for the first and last elements, namely,

“a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers” and

“the at least one of the plurality of computers is further programmed . . . to transmit the unique key value to the network server.”

This assertion is incorrect because White fails to disclose another element of claim 1, namely,

“the at least one of the plurality of computers is further programmed . . . to convert the word or phrase into a unique key value using the conversion table” (the conversion table comprised by the at least one of the plurality of computers, per the previous claim element).

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This element is not disclosed or suggested in White.

White discloses a system that generates a compiled program that runs on a single computer. The compiled program is compiled using string identifiers rather than actual strings, with the strings stored external to the compiled program so that the program can use different languages without having to be recompiled. The benefit of being able to change or update languages without recompiling the software is at the cost of some flexibility. The examiner reads White's text message system database 13 onto the claimed conversion table. Office action, p. 2. The examiner further reads the user requests to the compiled program for text messages at run-time disclosed in White on the claimed computer "programmed to receive a selection of a word or phrase." Office action, p. 3. The next claim element states that the computer is programmed "to convert the word or phrase into a unique key value using the conversion table." (emphasis added). "The word or phrase" refers to the antecedent in the preceding element of a word or phrase that was received as a selection. However, the examiner relies on "FIG. 1, his specified language and text string identifier, col. 2 line 59 to col. 3, lines 7 [sic]" of White as disclosing this element.

Taking these two citations to White in turn, in FIG. 1 of White, the "specified language and text string identifier" is shown as being sent from software build 16 to text string database 13, which returns a text string in a specified language. The claim, though, recites a conversion from a word or phrase received as a selection to a unique key value using the conversion table. Further, White does not disclose software build 13 doing any internal conversions using the text string database 13 (conversion table).

The examiner's second citation is to column 2, line 59 to column 3, line 7 of White as meeting the "to convert" element. This passage, however, relates entirely to the creation of the text message system database 13 (read by the examiner on the claimed conversion table) not any conversion performed using the text message system database.

Accordingly, the examiner has failed to make a *prima facie* case that White discloses or suggests the "to convert" element of claim 1.

Even if White is somehow interpreted as disclosing the "to convert" element of claim 1, the examiner has not shown any motivation or suggestion to combine White with Atkin.

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The system disclosed in White “is used to produce a software build 16 that allows a user to specify, at run-time, the language in which text messages are to be provided without reinstalling the software.” (White, col. 2, lines 22-26) Accordingly, the text messages used in White are not stored within the system but in a “free-standing text message system database” and the system is therefore language-independent. White achieves this intended purpose by compiling the application with “a language-independent string identifier. (White, col. 2, line 53). The system database 13 is populated with the exact text strings to be displayed as follows, “[l]ater, for each identifier, text strings are provided by a text string adder 14 (preferably a member of a development team) in additional spoken languages using the identifier for the first key (or search field) and the text message language for each additional string as the second key (or search field), i.e. using an identifier of the language in which the text message is expressed as the second key or search field.” (White, col. 2, line 65 – col. 3 line 5).

“When the software is required to present a text message, typically as the result of an action by the user, the correct text message is extracted from the text message system database 13 based on an identifier known by the software build to correspond to the text message needed by the user, and based on the user having specified the language in which the text message is to be provided.” (White col. 2, lines 35-43).

To summarize, White discloses a system that generates a compiled program that runs on a single computer. This computer uses string identifiers so that the compiled program can use different languages without having to recompile the program. The benefit of being able to change or update languages without recompiling the software is at the cost of some flexibility. The software can only use the predefined text strings identified by the string identifier at the time the software was compiled.

On the other hand, Atkin discloses a data processing network in which a module “JILResourceBundle 210 transmits to server 212 an HTTP message for each user interface text string requiring translation (i.e., all text strings within the ‘default’ ResourceBundle 208) containing the text string (as a Unicode string, for example) to be translated, an identification of the source language, and an identification of the target language.” During language translation,

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the data processing network of Atkin transmits to the translation engine text to be translated, an identification of the source language, and an identification of the target language.

To summarize, Atkin discloses a system in which entire text strings entered by users and language codes are sent over a network to a translation engine that translates the text strings in real time from the language of one language code to the language of another language code. The system of Atkin operates in this manner because its purpose is to allow users to translate any text string, not just a limited set of predefined text strings, such as is used in White.

There is no suggestion or motivation, though, to combine Atkin with White. As indicated above, nothing in White provides a suggestion or motivation to move the language library to a server over a network. Indeed, moving the language library to a server accessed over a network would restrict the compiled program of White from working unless the computer running the program is connected to the network. This would be a restriction on the operation of the system without any concomitant benefit to motivate or suggest making such a modification. On the other hand, there is no motivation to modify Atkin to use the pre-defined string identifiers of White. The purpose of Atkin is to allow that translation of any text string entered by the user, which would be impossible using White's strings that are defined before compilation of the program and use by the user.

In the Office action dated August 10, 2004, the examiner's only support for a motivation or suggestion to combine was that the combination "would provide [1] a localizing system that can provide support for a wide array of languages dynamically selected at run time and without the need for modification of the application and also [2] multiple users the capability to use the translation table since it is located on the network server." White, by itself, already discloses support for a wide array of languages dynamically selected at run time and without the need for modification of the application. (White, col. 2, lines 23-29). Thus, the examiner's first basis for a motivation or suggestion to combine Atkin with White fails. With respect to the examiner's other basis, providing "multiple users the capability to use the translation table since it is located on the network server," Atkin disclosure of an Internet service that translates free-form text and does not use translation tables as described in White does nothing to suggest that White's system be modified to move a conversion table to a network any more than general knowledge that

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computers can be networked. Accordingly, the examiner has not made a *prima facie* showing of a motivation or suggestion to combine White and Atkin.

Claims 2-3 are dependent on claim 1 and are improperly rejected for the same reasons claim 1 was improperly rejected.

b. Claims 19-21

In the Office action, the examiner grouped together claims 1, 19, 26 and 28-33 into the same rejection (pages 2-3). However, the body of this rejection only applies the disclosure of White and Atkin to claim 1, not to any of claims 19, 26 and 28-33.

Claim 19 is similar to claim 1, but the conversion table in claim 19 is comprised in a network server and the network server receives a word or phrase from another computer and the network server converts the word or phrase using a conversion table with unique key values corresponding to text phrases. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

Claims 20-21 are dependent on claim 19 and are improperly rejected for the same reasons claim 19 was improperly rejected.

c. Claim 26-27

Claim 26 is also similar to claim 1, but in claim 26 a computer uses the conversion table both to convert a phrase into a unique key value and convert a unique key value into a phrase. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

Claim 27 is dependent on claim 26 and is improperly rejected for the same reasons claim 26 was improperly rejected.

d. Claim 28

Claim 28 is also similar to claim 1, but in claim 28 a network server transmits a unique key value received from one computer to a second computer that uses the unique key value and a

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conversion table to display a phrase for the unique key value corresponding to a language key. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

e. Claim 29

Claim 29 is also similar to claim 1, but in claim 29 a network server receives a selection of a word or phrase and transmits a unique key value for the word or phrase from a conversion table to another computer that converts the unique key value into a word or phrase using a conversion table and displays the converted word or phrase. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

f. Claim 30

Claim 30 is also similar to claim 1, but in claim 30, a computer receives a selection of a word or phrase, looks up a corresponding unique key value in a conversion table and transmits the unique key value and a second computer receives the unique key value, looks up a converted word or phrase in a conversion table and displays the converted word or phrase. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

g. Claim 31

Claim 31 is also similar to claim 1, but in claim 31, a computer receives a selection of a word or phrase, looks up a corresponding unique key value in a conversion table and transmits the unique key value to a network server that looks up a converted word or phrase in a conversion table and transmits the converted word or phrase to a second computer that displays it. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim

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elements are found in the combination of White and Atkin, even if such a combination was not improper.

h. Claim 32

Claim 32 is also similar to claim 1, but in claim 32, a computer with a conversion table is programmed to receive a selection of a unique key value, convert the unique key value into a converted word or phrase and display the converted word or phrase. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

i. Claim 33

Claim 33 is also similar to claim 1, but in claim 33, a computer is programmed to receive a selection of a word or phrase, convert it into a converted word or phrase using a conversion table with unique key values and transmit the converted word or phrase to a network server. This is not disclosed in White and the examiner has not made any statements asserting otherwise. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements are found in the combination of White and Atkin, even if such a combination was not improper.

j. Claims 4 and 22

The examiner's rejected dependent claims 4 and 22 asserting the combination of White with Atkin teaches the network server programmed to receive the unique key value from the computer and transmits the unique key value to a second of the at least one of the computers. This assertion is in error. Even if it would have been obvious to modify White with Atkin such that White generally utilized network connections (which it is not), White does not disclose any computer/server receiving a unique key value from one computer and transmitting the unique key value to a second (or even the same) computer. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements of claims 4 and 22 are found in the combination of White and Atkin, even if such a combination was not improper.

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As claims 4 and 22 are dependent on claims 1 and 19, respectively, discussed above, their rejection is also improper for the same reasons the rejections of claims 1 and 19, respectively, are improper.

k. Claims 5, 7-12, and 23

Claims 5, 7-12 and 23 each recite a second conversion table. The examiner did not address claims 5, 7-12 and 23 apart from claims 4 and 22 and thus, the examiner does not even assert that White with Atkin discloses or suggests a second conversion table. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements of claims 5, 7-12 and 23 are found in the combination of White and Atkin, even if such a combination was not improper.

As claims 5, 7-12 are dependent on claim 4, discussed above, and claim 23 is dependent on claim 22, discussed above, their rejection is also improper for the same reasons the rejections of claims 4 and 22, respectively, are improper.

l. Claim 6

Claims 6 further recites that the second computer is programmed to receive a unique key value from the network server and convert it into a word or phrase using the second conversion table. The examiner did not address claim 6 apart from claim 4 and thus, the examiner does not even assert that White with Atkin discloses or suggests that the second computer is programmed to receive a unique key value from the network server and convert it into a word or phrase using the second conversion table. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements of claim 6 are found in the combination of White and Atkin, even if such a combination was not improper.

As claim 6 is dependent on claim 5, discussed above, its rejection is also improper for the same reasons the rejection of claim 5 is improper.

m. Claims 13 and 17-18

Claims 13 and 17-18 are dependent on claim 1, but also recite that network server comprises a server conversion table. The examiner's rejected claims 13 and 17-18 asserting White teaches the network server comprising a server conversion table, citing text string

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database 13. This assertion is also incorrect. For claim 1 (on which claim 13 depends), the examiner read text string database 13 on the conversion table comprised in one the computers other than the network servers. It is erroneous to read the same text string database 13 on both the conversion tables in one of the network servers and one of the computers. Accordingly, the examiner has not made a *prima facie* showing that all of the claim elements of claim 13 and 17-18 are found in the combination of White and Atkin, even if such a combination was not improper.

As claims 13 and 17-18 are dependent on claim 1, discussed above, their rejections are also improper for the same reasons the rejection of claim 1 is improper.

n. Claims 14-16 and 24

The examiner's rejected dependent claims 14-16 and 24 asserting the combination of White with Atkin teaches the network server is programmed to receive the unique key from the computer. This rejection is erroneous. Even if it would have been obvious to modify White with Atkin to arrive at the teaching asserted by the examiner (which it is not, as discussed above), claims 14-16 and 24 each recite additional elements, such as the network server being programmed to convert the unique key value into a word or phrase and transmit the word or phrase to a second of the computers. The examiner fails to address these elements at all and thus fails to indicate where White and/or Atkin disclose or suggest such elements. Accordingly, the examiner has failed to make a *prima facie* showing of obviousness of claims 14-16 and 24.

As claims 14-16 and 24 are dependent on claims 13 and 19, respectively, discussed above, their rejections are also improper for the same reasons the rejections of claim 13 and 19 are improper, respectively.

o. Conclusion

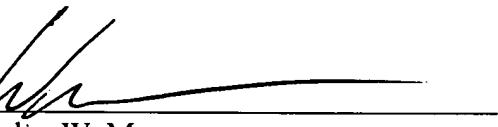
As discussed above in detail, the examiner has not made a *prima facie* showing that all of the elements of any of the claims are disclosed or suggested by the combination of White and Atkin. Further, even if the all of the elements of one of the claims were disclosed in the combination of White and Atkin, the examiner has failed to make a *prima facie* showing that there is any motivation or suggestion to combine White and Atkin and thus it would have been

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obvious to combine White and Atkin. Thus, for two independent reasons, the examiner's rejections were improper and should be reversed.

Respectfully submitted,

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CLAIM APPENDIX

Claim 1. A system comprising:

 a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers:

 wherein at least one of the plurality of computers comprises a conversion table, the conversion lookup table comprising;

 a unique key value for each of a plurality of unique words or phrases;

 a language key for at least one language; and

 a plurality of text phrases each corresponding to a language key and a unique key value; and

 wherein the at least one of the plurality of computers is further programmed:

 to receive a selection of a word or phrase;

 to convert the word or phrase into a unique key value using the conversion table;

 and

 to transmit the unique key value to the network server.

Claim 2. The system of claim 1, wherein the conversion table comprises language keys and text phrases for more than one language.

Claim 3. The system of claim 1, wherein the conversion table comprises text phrases for only one language key.

Claim 4. The system of claim 1, wherein the network server is programmed to receive the unique key value from the computer and transmit the unique key value to a second of the at least one of the computers.

Claim 5. The system of claim 4, wherein the second computer further comprises a second conversion table, the second conversion table comprising:

 a unique key value for each of a plurality of unique words or phrases;

 a language key for at least one language; and

a plurality of text phrases each corresponding to a language key and a unique key value.

Claim 6. The system of claim 5, wherein the second computer is programmed to receive a unique key value from the network server and convert the unique key value into a word or phrase using the second conversion table.

Claim 7. The system of claim 5 wherein the second conversion table comprises language keys and text phrases for more than one language.

Claim 8. The system of claim 5 second conversion table comprises text phrases for only one language.

Claim 9. The system of claim 5, where the conversion table contains a proper subset of the information contained within a server conversion table.

Claim 10. The system of claim 9 wherein the second conversion table contains a proper subset of the information contained within the server conversion table.

Claim 11. The system of claim 10 wherein the second conversion table contains less than all the language contained within the server conversion table.

Claim 12. The system of claim 5, where the conversion table contains less than all the languages contained within a server conversion table.

Claim 13. The system of claim 1, wherein the network server further comprises a server conversion table, the server conversion table comprising:

 a unique key value for each of a plurality of unique words or phrases;
 a language key for at least one language; and

a plurality of text phrases each corresponding to a language key and a unique key value.

Claim 14. The system of claim 13 wherein the network server is programmed to receive the unique key value from the computer, convert the unique key value into a word or phrase using the server conversion table and transmit the word or phrase to a second one of the at least a plurality of computers.

Claim 15. The system of claim 14 wherein the conversion table comprises language keys and text phrases for more than one language.

Claim 16. The system of claim 14 wherein the conversion table further comprises text phrases for only one language.

Claim 17. The system of claim 13, where the conversion table contains a proper subset of the information contained within the server conversion table.

Claim 18. The system of claim 13, where the conversion table contains less than all the languages contained within the server conversion table.

Claim 19. A system comprising:

 a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers;

 wherein at least one of the plurality of network servers comprises a server conversion table, the server conversion table comprising:

 a unique key value for each of a plurality of unique words or phrases;

 a language key for at least one language; and

 a plurality of text phrases each corresponding to a language key and a unique key value; and

wherein the network server is programmed to receive a word or phrase from one of the at least one of a plurality of computers and convert the word or phrase using the server conversion table.

Claim 20. The system of claim 19 wherein the conversion table comprises language keys and text phrases for more than one language.

Claim 21. The system of claim 19 wherein the conversion table comprises text phrases for only one language.

Claim 22. The system of claim 19, wherein the network server is programmed to transmit a unique key value to a second of the at least one of a plurality of computers.

Claim 23. The system of claim 22, wherein the second computer comprises:
a conversion table, the conversion table comprising:
a unique key value for each of a plurality of unique words or phrases;
a language key for at least one language; and
a plurality of text phrases each corresponding to a language key and a unique key value; and

wherein the second computer is programmed to receive the unique key value from the network server and convert the unique key value into a word or phrase using the conversion table.

Claim 24. The system of claim 19, wherein the network server is programmed to convert the unique key value into a phrase corresponding to a language key for a second of the at least one of a plurality of computers using the server conversion table and transmitting the phrase to a second computer.

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Claim 25. The system of claim 24, wherein the server conversion table comprises language keys and text phrases for more than one language.

Claim 26. In a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers, wherein one of the at least one of a plurality of computers is comprised of a conversion table, the conversion table comprising:

- a unique key value for each of a plurality of unique words or phrases;
- a language key for at least one language; and
- a plurality of text phrases each corresponding to a language key and a unique key value;

wherein the one computer is programmed:

- to receive a selection of a phrase;
- to convert the phrase into a unique key value using the conversion table; and
- convert the unique key value into a phrase according to a language key using the conversion table.

Claim 27. The system of claim 26 wherein the conversion table comprises language keys and text phrases for more than one language.

Claim 28. In a communications network connecting network servers comprising a server conversion table, the server conversion table having a plurality of words or phrases corresponding to a language key and a unique key value, and at least one of a plurality of computers each comprising a conversion table, the conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; the method of converting language comprising the steps of:

- a first of the plurality of the computers receiving a selection of a word or phrase;
- the first computer looking up the unique key value stored in the conversion table corresponding to the received word or phrase;

the first computer transmitting the unique key value to the network server;
the network server transmitting a unique key value to a second computer;
a second of the plurality of the computers receiving the unique key value from the network server;

the second computer looking up a converted word or phrase in the conversion table corresponding to the received unique key value and a language key; and
the second computer displaying the word or phrase.

Claim 29. In a communications network connecting at least one of a plurality of network servers each comprising a server conversion table, the server conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; and at least one of a plurality of computers each comprising a conversion table, the conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; the method of converting language comprising the steps of:

the network server receiving a selection of a word or phrase;
the network server looking up the unique key value stored in the server conversion table corresponding to the received word or phrase;
the network server transmitting the unique key value to a computer;
the computer receiving the unique key value from the network server;
the computer looking up a converted word or phrase in the conversion table corresponding to the received unique key value and a language key; and
the computer displaying the converted word or phrase.

Claim 30. In a communications network connecting at least one of a plurality of computers each comprising a conversion table, the conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; the method of converting language comprising the steps of:

the computer receiving a selection of a word or phrase; and

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the computer looking up the unique key value stored in the conversion table corresponding to the received word or phrase;

the computer transmitting the unique key value to a second computer using the communications network;

the second computer receiving the unique key value from the network server;

the second computer looking up a converted word or phrase in the conversion table corresponding to the received unique key value and a language key; and

the second computer displaying the converted word or phrase.

Claim 31. In a communications network connecting at least one of a plurality of network servers each comprising a server conversion table, the server conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; and at least one of a plurality of computers each comprising a conversion table, the conversion table having a plurality of words or phrases corresponding to a language key and a unique key value; the method of converting language comprising the steps of:

the computer receiving a selection of a word or phrase;

the computer looking up the unique key value stored in the conversion table corresponding to the received word or phrase;

the computer transmitting the unique key value to the network server;

the network server looking up a converted word or phrase in the server conversion table corresponding to the received unique key value and a language key;

the network server transmitting the converted word or phrase to a second computer;

the second computer receiving the converted word or phrase from the network server; and

the second computer displaying the converted word or phrase.

Claim 32. A system comprising:

a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers;

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wherein at least one of the plurality of computers comprises a conversion table, the conversion table comprising:

 a unique key value for each of a plurality of unique words or phrases; and
 a language key for at least one language; and
 a plurality of text phrases each corresponding to a language key and a unique key value; and

 wherein the at least one of the plurality of computers further programmed:
 to receive a selection of a unique key value;
 to convert the unique key value into a word or phrase using the conversion table;
 and
 to display the converted word or phrase.

Claim 33. A system comprising:

 a communications network connecting at least one of a plurality of network servers and at least one of a plurality of computers;

 wherein at least one of the plurality of computers comprises a conversion table, the conversion table comprising:

 a unique key value for each of a plurality of unique words or phrases;
 a language key for at least one language; and
 a plurality of text phrases each corresponding to a language key and a unique key value;

 wherein the at least one of the plurality of computers further programmed:

 to receive a selection of a word or phrase;
 to convert the word or phrase into a converted word or phrase using the conversion table; and

 to transmit the converted word or phrase to the network server.

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EVIDENCE APPENDIX

None

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RELATED PROCEEDINGS APPENDIX

None

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